

DATE, et al., 10/047,103  
03 July 2008 Amendment  
Responsive to 03 January 2008 Office Action

500.37453CX3 / E4690-09EO  
Page 7

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JUL 03 2008

#### REMARKS

This paper is responsive to any paper(s) indicated above, and is responsive in any other manner indicated below.

#### CONCURRENT REQUEST FOR CONTINUED EXAMINATION (RCE)

Submitted concurrently herewith is a Request for Continued Examination (RCE) transmittal. In the event that the RCE transmittal is not filed herewith, then this paper should be taken as a request for the filing of an RCE.

#### PRIOR RESPONSE ASSUMED TO BE ENTERED

Applicant's prior 03 April 2008 Response (and any associated papers) is assumed to have been entered (e.g., as a result of the filing of the present RCE). Attention is directed to, and the Examiner should consider, the contents of such paper(s) in the continuing prosecution of this application.

#### PENDING CLAIMS

Claims 1, 2 and 5-7 were pending, under consideration and subjected to examination in the Office Action. At entry of this paper, Claims 1, 2 and 5-10 will be pending for further consideration and examination in the application.

DATE, et al., 10/047,103  
03 July 2008 Amendment  
Responsive to 03 January 2008 Office Action

500.37453CX3 / E4690-09EO  
Page 8

### **ALL REJECTIONS UNDER 35 USC '102 AND '103 - TRAVERSED**

All 35 USC rejections (i.e., the 35 USC '102 rejection of claim 7 as being anticipated by Miike et al. (U.S. Patent 5,787,814); and, the 35 USC '103 rejection of claims 1, 2, 5 and 6 as being unpatentable over Miike et al. (U.S. Patent 5,787,414) in view of Gagne et al. (U.S. Patent Pub 2002/0023103)) are respectfully traversed.

All descriptions of Applicant's disclosed and claimed invention, and all descriptions and rebuttal arguments regarding the applied prior art, as previously submitted by Applicant in any form, are repeated and incorporated hereat by reference. Further, all Office Action statements regarding the prior art rejections are respectfully traversed. As additional arguments, Applicant respectfully submits the following.

Applicant's disclosed and claimed invention is directed to an improved arrangement which can be used to manage a large number of separately-stored still image files (or documents) arranged into a group (i.e., collection), while at the same time, allowing fast searches with respect to the group, and only requiring a small amount of memory resources to store group management information. More particularly, in the art, when a digital camera takes still pictures, individual still pictures are stored within separate computer files. Applicant's invention may be used to divide a plurality of separately-stored still image files into different groups, e.g., by forming a new group for every 64 still pictures. If a search for a picture based upon a picture's origination (i.e., production) time is performed with respect to the group, and if the search was required to compare against a start-time and/or end-time for each picture, searching may be onerous, i.e., take a long processing

DATE, et al., 10/047,103  
 03 July 2008 Amendment  
 Responsive to 03 January 2008 Office Action

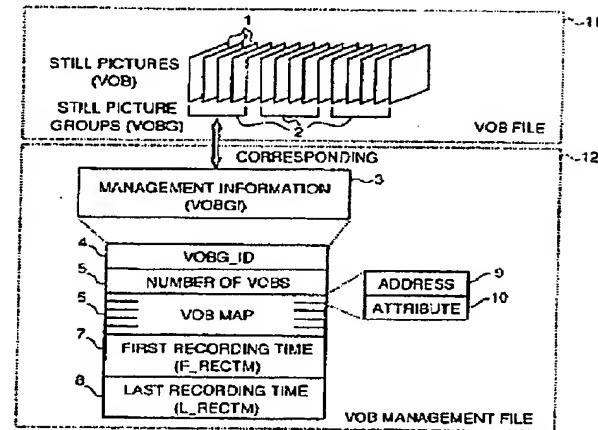
500.37453CX3 / E4690-09EO  
 Page 9

time to perform the comparison with each picture's data, and a large memory would be required to store the start-time and/or end-time for each picture.

In order to allow quicker searching with respect to a group, and in order to afford the opportunity to reduce an amount of memory required for management information, Applicant's disclosed and claimed invention includes an arrangement where "still picture group management information includes a first recording time at which the still picture data of an earliest-photographed still picture in said still picture group was recorded first by a picture-taking device, and a last recording time at which the still picture data of a latest-photographed still picture in said still picture group was recorded last by the picture-taking device". Such "still picture group management information" is "provided separately from any still picture management information containing management information for each still picture". That is,

if still picture management information containing management information is provided (see VOB map 6 in Applicant's FIG. 1, reproduced herewith for convenience), Applicant's "still picture group management information" 7, 8 is provided separate from the still picture management information.

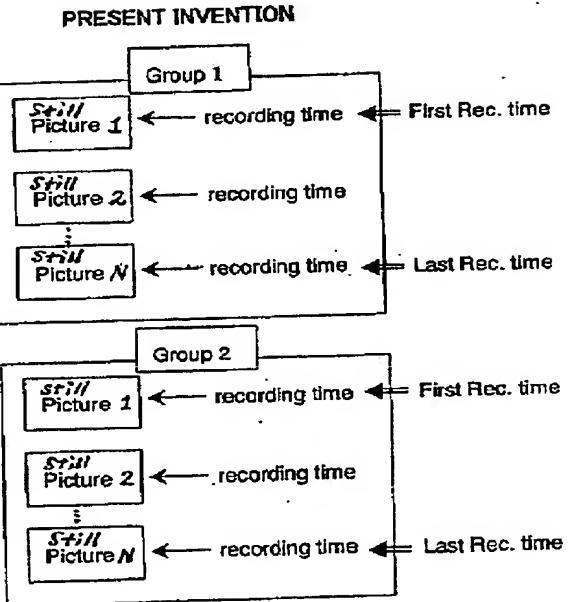
FIG. 1



DATE, et al., 10/047,103  
03 July 2008 Amendment  
Responsive to 03 January 2008 Office Action

500.37453CX3 / E4690-09EO  
Page 10

If two groups of still pictures were to be formed, a representation of such groups via Applicant's invention might be shown by the following sketch. Again, Applicant's invention can reduce an amount of memory required for group management information if the "first recording time at which the still picture data of an earliest-photographed still picture in said still picture group was recorded first by a picture-taking device, and a last recording time at which the still picture data of a latest-photographed still picture in said still picture group was recorded last by the picture-taking device" is included, but the recording time for each individual picture is excluded.



In terms of distinguishing features/limitations, Applicant's independent claim 1 (taken as an example), recites: "A method for recording still picture data of N still pictures stored in separate N files, respectively, and for recording still picture group management information for managing N still picture data of said N still pictures as a still picture group, onto a storage medium, where N is an integer number equal to or larger than one, wherein said still picture group management information is provided separately from any still picture management information containing management information for each still picture, and said still picture group management information includes a first recording time at which the still picture data of an earliest-photographed still picture in said still

DATE, et al., 10/047,103  
03 July 2008 Amendment  
Responsive to 03 January 2008 Office Action

500.37453CX3 / E4690-09EO  
Page 11

picture group was recorded first by a picture-taking device, and a last recording time at which the still picture data of a latest-photographed still picture in said still picture group was recorded last by the picture-taking device, said method comprising: comparing a recording time of said still picture data of a still picture, with said first recording time stored in said still picture group management information corresponding to the still picture group belonging to said still picture data; and if said recording time is earlier than said first recording time, replacing the content of said first recording time by said recording time and performing recording thereof." Applicant's independent claim 5 have similar or analogous features/limitations. Applicant's independent claim 7 is broader and contains important ones of such features/limitations.

Turning now to rebuttal of the Miike et al. reference, Miike et al. does teach (column 47, lines 33-40, for example) saving a "production start time" and a "production end time" with respect to a produced "document". However, a thorough understanding of the Miike et al. disclosure reveals that such teachings do not disclose or suggest Applicant's claimed arrangement.

More particularly, it is respectfully submitted that Miike et al. "document" is the same as a computer "file", i.e., they are analogous. So when Miike et al. speaks of "production start time" and a "production end time" with respect to a produced "document", Miike et al. disclosure means that the time when production of that particular document (or computer file) is started, and the time when production of that particular document (or computer file) is completed, are saved with respect to that document. For example, if a user starts work at 6:00pm on a

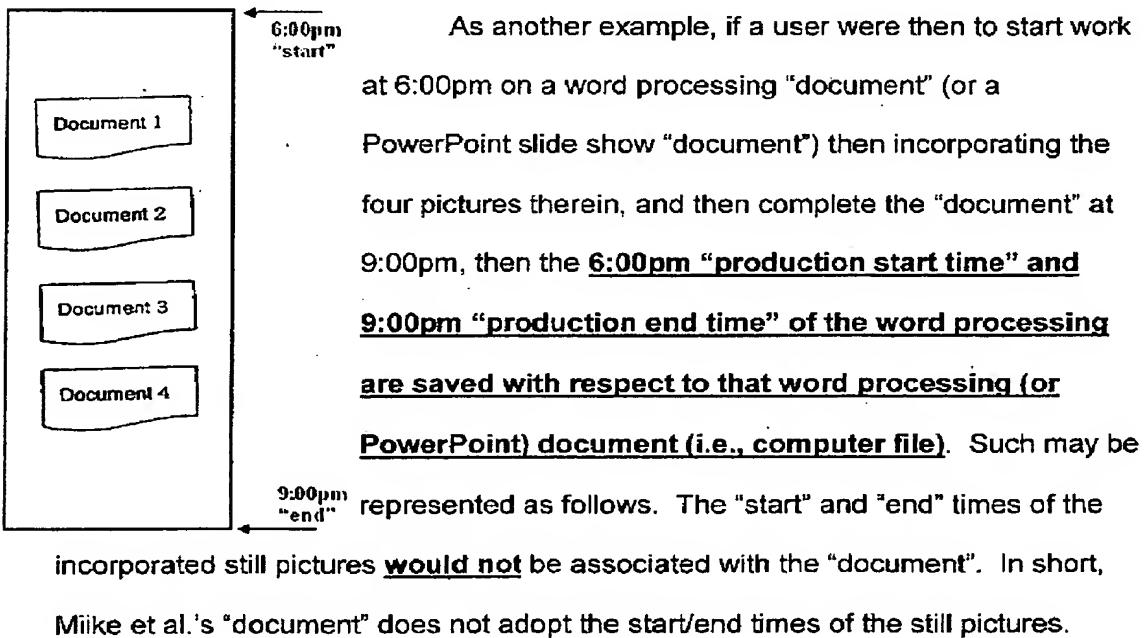
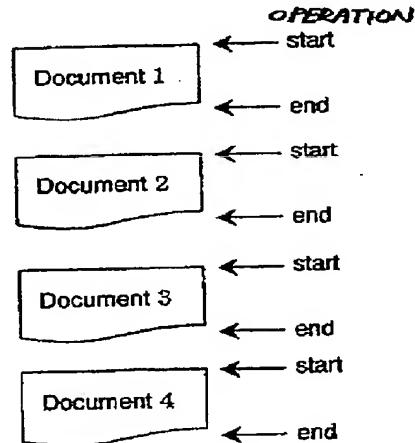
DATE, et al., 10/047,103  
 03 July 2008 Amendment  
 Responsive to 03 January 2008 Office Action

500.37453CX3 / E4690-09EO  
 Page 12

word processing "document" and completes at 9:00pm, then the 6:00pm "production start time" and 9:00pm "production end time" are saved with respect to that document (i.e., computer file).

If one were to take four still pictures at 1:00pm, 2:00pm, 3:00pm and 4:00pm, then still picture files as examples of Miike et al.'s disclosed "document" arrangement, would be represented by the following sketch. That is, each separate still picture would have its own "document" or computer file, and each separate still picture "document" would then have Miike et al.'s start time and end time associated therewith.

Miike et al

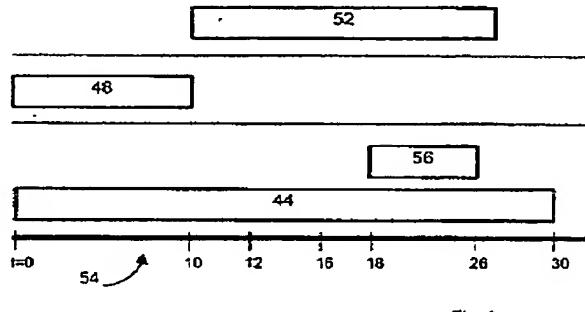


DATE, et al., 10/047,103  
 03 July 2008 Amendment  
 Responsive to 03 January 2008 Office Action

500.37453CX3 / E4690-09EO  
 Page 13

Turning next to Gagne, such reference would not cure the major deficiency mentioned above with respect to the primary Miike et al. reference. More particularly, Gagne is directed to arrangements for accessing and manipulating time-based data using meta-clip objects.

For example, Gagne's FIG. 4 (reproduced herewith for convenience) pertains to an example construction of a 30-second commercial formed of a plurality of clips, i.e., 52 represents a



3D-animation clip; 48 represents a video clip; 44 and 56 represent audio clips. A 30-second "global time line" 54 is shown at a bottom of FIG. 4.

Gagne is first deficient, in that Gagne's FIG. examples do not concern still images, i.e., only disclose audio, video and animation clips. Second, even if one were to assume for argument purposes that two or more of the clips 44, 48, 52, 56 were "still images", Gagne's "global time line" does not relate to any of the clips, i.e., the "global time line" relates to a running time (or length) of the document itself, i.e., 30 seconds.

Third, while Gagne does adjust times (asserted within the Office Action) when Gagne's work product (e.g., 30-second commercial) is edited, Gagne's adjustment is for a wholly different purpose and type in comparison to the present Applicant's adjustment features/limitations. More particularly, the purpose of Gagne's time adjustments are to Maintain positioning of certain ones of the clips with respect to each other. For example, the audio clip 56 is meant to play

DATE, et al., 10/047,103  
03 July 2008 Amendment  
Responsive to 03 January 2008 Office Action

500.37453CX3 / E4690-09EO  
Page 14

at a certain time relative to the animation clip 52. If the animation clip 42 is physically moved, then Gagne's arrangement will also move or adjust the position or timing of the audio clip, correspondingly, so as to maintain the timing relationship between the clips 52 and 56.

Since Gagne does not relate to a group of still pictures, and since Gagne's "global time line" relates to the documents running time, then nowhere does Gagne teach "comparing a recording time of said still picture data of a still picture, with said first recording time ...[at which the still picture data of an earliest-photographed still picture in said still picture group was recorded first by a picture-taking device] ...; and if said recording time is earlier than said first recording time, replacing the content of said first recording time by said recording time and performing recording thereof."

Finally, in closing the Undersigned's comments, with respect to any allegation that a video clip is just a collection or group of still pictures, it is respectfully noted that a video clip is stored within a singular video computer file, i.e., a video clip would not meet Applicant's claimed feature/limitations of "still picture data of N still pictures stored in separate N files, respectively".

In addition to the foregoing, the following additional remarks from Applicant's foreign representative are also submitted in support of traversal of the rejection and patentability of Applicant's claims.

The actual use of Applicant's present invention is, for example, that the still picture images are shot by a digital still camera and then still image data are stored in a digital versatile disk (DVD) at each shot, and the data of many still images is managed based on the still picture group management information. The imaging

DATE, et al., 10/047,103  
03 July 2008 Amendment  
Responsive to 03 January 2008 Office Action

500.37453CX3 / E4690-09EO  
Page 15

device produces a time of the shooting (recording) of the first still image data and a time of shooting of the last still image data, and attaches the first recording time and the last recording time to the still picture group management information for each still picture group. Such still picture group management information is recorded together with the still picture data in the optical disk (see added dependent claims 8-10). The DVD is one type of optical disks. Since a digital video camera may also shoot the still images, it is not necessary to limit the imaging device to a still camera.

The disk player reproduces the still picture images from the optical disk. The still picture group management information is utilized in rapid search of desired still pictures and reproduction (playing back) of the desired still picture images from the optical disk. The still picture group management information includes the first recording time and the last recording time of the still pictures in each group.

The Examiner has stated that Miike et al. discloses, in col. 46, lines 46-50, that the easiest way to retrieve an image is to correspond that image to a certain time wherein that certain time can be its production time. However, the image referred in Miike et al does not mean a still picture image but a video image that is a moving picture. The Examiner has also stated that it is well-known in the art that video images are created from a group of still pictures that are stored separately and linked together. The still pictures are produced separately and independently from each other. The moving picture is produced in a sequential shooting of image and composed of a series of frame images. The managing of the video image data for retrieving of data is very different from the managing of still picture image data. It is meaningless to group a plurality of frames which are a part of a moving picture for retrieving the moving picture. Miike et al does not teach the grouping of

DATE, et al., 10/047,103  
03 July 2008 Amendment  
Responsive to 03 January 2008 Office Action

500.37453CX3 / E4690-09EO  
Page 16

the still picture images and the first and last recording times are checked in each of the still picture groups.

Miike et al discloses a data retrieval system for retrieving of a desired document data from a database of the computer system in which image data and audio data may also introduced into the database via the input unit. However, the input unit of Miike et al. does not produce a time of the shooting (recording) of the first still image data and a time of shooting of the last still image data, or attach the first recording time and the last recording time to the still picture group management information for each still picture group. Miike et al does not teach that the still picture group management information including the first and last recording times is recorded together with the still picture data in the optical disk before playing back of the optical disk. Further, Miike et al. does not teach that the disk player reproduces the still picture images from the optical disk, and the still picture group management information is utilized in rapid search of desired still pictures and reproduction (playing back) of the desired still picture images from the optical disk.

As a result of all of the foregoing, it is respectfully submitted that the applied art would not support a '102 anticipatory-type rejection or '103 obviousness-type rejection of Applicant's claims. Accordingly, reconsideration and withdrawal of such '102 and '103 rejections, and express written allowance of all of the rejected claims, are respectfully requested.

DATE, et al., 10/047,103  
03 July 2008 Amendment  
Responsive to 03 January 2008 Office Action

500.37453CX3 / E4690-09EO  
Page 17

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**EXAMINER INVITED TO TELEPHONE**

**JUL 03 2008**

The Examiner is herein invited to telephone the undersigned attorneys at the local Washington, D.C. area telephone number of 703/312-6600 for discussing any Examiner's Amendments or other suggested actions for accelerating prosecution and moving the present application to allowance.

**RESERVATION OF RIGHTS**

It is respectfully submitted that any and all claim amendments and/or cancellations submitted within this paper and throughout prosecution of the present application are without prejudice or disclaimer. That is, any above statements, or any present amendment or cancellation of claims (all made without prejudice or disclaimer), should not be taken as an indication or admission that any objection/rejection was valid, or as a disclaimer of any scope or subject matter. Applicant respectfully reserves all rights to file subsequent related application(s) (including reissue applications) directed to any/all previously claimed limitations/features which have been subsequently amended or cancelled, or to any/all limitations/features not yet claimed, i.e., Applicant continues (indefinitely) to maintain no intention or desire to dedicate or surrender any limitations/features of subject matter of the present application to the public.

DATE, et al., 10/047,103  
03 July 2008 Amendment  
Responsive to 03 January 2008 Office Action.

500.37453CX3 / E4690-09EO

Page

**RECEIVED  
CENTRAL FAX CENTER****CONCLUSION****JUL 03 2008**

In view of the foregoing amendments and remarks, Applicant respectfully submits that the claims listed above as presently being under consideration in the application are now in condition for allowance.

To the extent necessary, Applicant petitions for an extension of time under 37 CFR '1.136. Authorization is herein given to charge any shortage in the fees, including extension of time fees and excess claim fees, to Deposit Account No. 01-2135 (Case No. 500.37453CX3) and please credit any excess fees to such deposit account.

Based upon all of the foregoing, allowance of all presently-pending claims is respectfully requested.

Respectfully submitted,

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